

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

JANE DOE, ALIAS

Plaintiff,

v.

JOHN DOES 1-32

Defendants.

Civil Action No.:

STATE OF OHIO)
COUNTY OF CUYAHOGA) SS

AFFIDAVIT

I, Daniel A. Powell, being first duly sworn according to law, depose and state as follows:

1. My name is Daniel A. Powell. I am over eighteen (18) years of age, competent to make this affidavit, and not disqualified by law from doing so.
2. Unless otherwise stated, I have personal knowledge of the facts asserted herein.
3. I am an attorney, duly licensed by and in good standing with the Supreme Court of Ohio. I am admitted to practice in all Ohio courts (2006-present), the U.S. Sixth Circuit Court of Appeals (2008-present), the U.S. Northern District of Ohio (2007-present), and the U.S. Southern District of Ohio (2021-present). I have remained in good standing with each court since the date of admission and have never been subject to disciplinary action.
4. I have been admitted pro hac vice by at least an additional seventeen (17) state courts, the District of Columbia, and two (2) additional U.S. federal district courts. My pro hac vice status has never been denied or revoked for any reason.

5. For the previous seven and a half years, my legal practice has focused exclusively on individuals harmed by online publications, including non-consensual intimate image sharing (revenge pornography).

6. Victims of revenge pornography very typically suffer extreme emotional distress from the reality of their intimate images being viewable on the Internet by family, friends, neighbors, co-workers, and even strangers.

7. Privacy is the paramount concern for most victims of revenge pornography. Not only do the victims wish to cause removal of the offending content from the Internet to protect their privacy, they desire for it to never be known that they are a victim of revenge pornography. In part, this is because they fear public knowledge that such images were ever created and/or shared.

8. There exists a shockingly strong demand for revenge pornography on the Internet, with a sizeable group of online users being aroused by viewing images they are not supposed to be able to view. Once published, the images are often downloaded and shared through multiple websites, channels, and forums, many of which are registered and/or hosted outside of the United States. Containing the dissemination of such content requires significant diligence and effort, but complete erasure is commonly not realistic.

9. My law firm has represented the Jane Doe Plaintiff since the time of the original leak of her intimate photographs. I have been directly involved with the removal efforts for the previous two years. Albums of the images and/or images published in isolation have been removed from hundreds of web pages but are continually re-published by pseudonymous Internet users identified as the Doe Defendants in this lawsuit.

10. As a result of the actions complained of in this lawsuit, Plaintiff is in a very fragile emotional state.

11. The complete album of Plaintiff's intimate images published online contains more than 70 images of Plaintiff in various states of nudity and an image of a text document containing Plaintiff's true name and contact information.

12. At times over the previous two years, Plaintiff's intimate images could be located through a simple Google search.

13. Plaintiff has suffered extreme emotional distress as a result of family members becoming aware of her being the victim of revenge pornography.

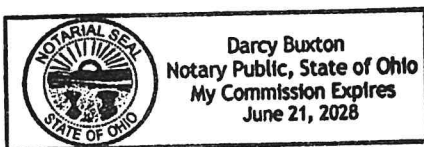
14. Plaintiff has suffered extreme emotional distress as a result of strangers contacting her after finding her intimate images and personal information online, falsely assuming she is a sex worker, and asking her to perform sexual acts.

15. Plaintiff will not proceed with this lawsuit if she is not protected by the anonymity contemplated by every revenge pornography law of which Affiant is aware.

FURTHER AFFIANT SAYETH NAUGHT.


Daniel A. Powell

The above signed personally before me and reviewed the contents of this affidavit before signing. Sworn to and subscribed in my presence this 10th day of February, 2025.




Notary Public